



Steven F. Molo
MoloLamken LLP
430 Park Avenue
New York, NY 10022
T: 212.607.8170
F: 212.607.8161
smolo@mololamken.com
www.mololamken.com

December 15, 2017

By ECF

Honorable Kimba M. Wood
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Rigas v. United States*, No. 11 Civ. 6964 & 02 Cr. 1236

Dear Judge Wood:

We represent John J. Rigas and Timothy J. Rigas, who recently retained MoloLamken LLP to work as co-counsel with Professor Lawrence Marshall in this litigation. We write to respectfully request that the Court extend the deadline by which to complete discovery on the Rigases' claims of prosecutorial interference. We have conferred with the Assistant United States Attorneys assigned to this matter, and they have no objection to our request.

On May 24, 2017, the Court granted the parties' joint request to set December 31, 2017 as the discovery deadline for the Rigases' interference claims. Dkt. No. 139. During discovery, the Rigases' legal team, led by Professor Marshall, has reviewed millions of documents from a number of different sources in a variety of electronic formats, as well as thousands of boxes of paper files.

Despite the diligent efforts of the team, a significant amount of review remains incomplete due to the massive scale of discovery. Additionally, the Rigases' legal team has encountered a number of technical challenges—including the labor-intensive process required to recover certain electronic files and restore hard drives—which have further exacerbated the need for an extension.

We are new to this complex matter and are in the process of properly assessing the scope of the remaining discovery and the most efficient way to proceed. We will confer with the government while doing so. Accordingly, we request respectfully that the Court vacate the current discovery deadline and set a status hearing in sixty days. At that point, we will report to

the Court on our progress and provide the Court and the government with a case management proposal.

Respectfully submitted,

/s/ Steven F. Molo

Steven F. Molo

MOLOLAMKEN LLP

Attorney for Petitioners

cc: AUSA Brian Roger Blais, via email
AUSA A. Damian Williams, via email
Professor Lawrence Marshall, via email

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th day of December, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties with an e-mail address of record who have appeared and consent to electronic service in this action.

Dated: December 15, 2017

/s/ Steven F. Molo
Steven F. Molo
MOLOLAMKEN LLP
430 Park Avenue
New York, NY 10022
(212) 607-8170 (telephone)
(212) 607-8161 (facsimile)
smolo@mololamken.com

Attorney for Petitioners